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FEDERAL COMMUNICATIONS COMMISSION  
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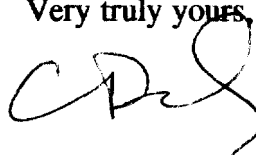
July 14, 1993

Ms. Donna Searcy  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Searcy:

Enclosed please find the original and ten copies of Comments filed by PrimeTime 24 in support of a Petition for Reconsideration and Clarification in the matter of Docket 92-265.

Very truly yours,



G. Todd Hardy

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FEDERAL COMMUNICATIONS COMMISSION  
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Before The

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C.

In The Matter Of:

Implementation of the Cable Television  
Consumer Protection and Competition  
Act of 1992

Development of Competition and  
Diversity in Video Programming  
Distribution and Carriage

MM Docket No. 92-265


COMMENTS OF PRIMETIME 24 IN SUPPORT OF THE  
PETITION FOR RECONSIDERATION AND CLARIFICATION  
FILED BY DISCOVERY COMMUNICATIONS, INC.

I. Introduction

PrimeTime 24 Joint Venture ("PrimeTime 24") is a partnership that is engaged principally in the retransmission of the broadcast television signals of WABC-TV (ABC, New York), WRAL-TV (CBS, Raleigh) and WXIA-TV (NBC, Atlanta) for the benefit of C-Band home satellite dish ("HSD") owners and a small number of cable operators located throughout the states, commonwealths, trusts, territories and possessions of the United States.

<sup>13</sup> *Id.*

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[illegible]

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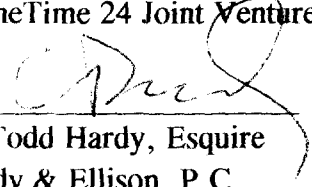
As noted in the Order, the Commission sought to comply with the mandate of the Cable Act of 1992 by supplying rules under which "competing" distributors of programming are afforded redress against prohibited discrimination. If those rules are allowed to operate in any comparisons involving distributors that either do not actually compete or to the degree that they do not actually compete, the purpose and policy of the Act will have been stretched beyond its purpose to the detriment of the natural workings of the marketplace.

As provided in the Order, the Commission will receive complaints

### III. Conclusion

The program access rules should be clarified to allow for the filing of distributor complaints for relief from price discrimination: only if the complaining distributor competes with another distributor in "substantial part" or only to the extent the distributors actually compete in any marketplace.

Respectfully submitted,  
PrimeTime 24 Joint Venture

By   
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Its Attorneys

July 14, 1993